

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

DISPLAY TECHNOLOGIES, LLC,

Plaintiff,

v.

NVIDIA CORPORATION, *et al.*,

Defendants.

Civil Action No. 2:15-cv-998-JRG-JRP

CONSOLIDATED LEAD CASE

JURY TRIAL DEMANDED

JOINT MOTION TO EXTEND THE STAY OF ALL DEADLINES

Plaintiff Display Technologies, LLC (“Plaintiff”), and Defendant Samsung Electronics America, Inc. (“Defendant”) (collectively, “the parties”) are awaiting final approval and signature on a settlement that resolves all matters in controversy between Plaintiff and Defendant in the above-entitled and numbered action. The parties expect to fully execute the agreement and jointly file a dismissal with prejudice of all claims between them within 14 days. Accordingly, Plaintiff and Defendant respectfully request the Court extend the stay of all deadlines between them for an additional 14 days, up to and including March 16, 2016. Plaintiff and Defendant request this extended Stay, not for the purposes of any delay, but so that they may fully execute the settlement agreement and file dismissal papers without incurring additional expenses.

DATED March 2, 2016.

Respectfully submitted,

By: /s/ Stevenson Moore
Hao Ni
Texas Bar No. 24047205
hni@nilawfirm.com
Timothy T. Wang
Texas Bar No. 24067927
twang@nilawfirm.com
Neal G. Massand
Texas Bar No. 24039038
nmassand@nilawfirm.com
Stevenson Moore V
Texas Bar No. 24076573
smoore@nilawfirm.com
Krystal L. McCool
Texas Bar No. 24082185
kgibbens@nilawfirm.com

NI, WANG & MASSAND, PLLC
8140 Walnut Hill Ln., Ste. 500
Dallas, TX 75231
Tel: (972) 331-4600
Fax: (972) 314-0900

**ATTORNEYS FOR PLAINTIFF
DISPLAY TECHNOLOGIES, LLC**

/s/ Ali R. Sharifahmadian
Matthew M. Wolf
(District of Columbia Bar No. 454323)
matthew.wolf@aporter.com
Ali R. Sharifahmadian
(District of Columbia Bar No. 480876)
ali.sharifahmadian@aporter.com
Jin-Suk Park
(District of Columbia Bar No. 484378)
jin.park@aporter.com
Arnold & Porter LLP
555 12th Street, NW
Washington, DC 20004
Telephone: (202) 942-5000
Facsimile: (202) 942-5555

Maxwell Preston
(New York State Bar No. 4806162)
maxwell.preston@aporter.com
Arnold & Porter LLP
399 Park Avenue
New York, NY 10022-4690
Telephone: (212) 715-1000
Facsimile: (212) 715-1399

**COUNSEL FOR DEFENDANT
SAMSUNG ELECTRONICS
AMERICA, INC.**

CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of March, 2016, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Eastern District of Texas, Marshall Division, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Stevenson Moore
Stevenson Moore